

**IN THE UNITED STATES BANKRUPTCY COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
MONTGOMERY DIVISION**

IN RE:

KENDRICK FINKLEA,

Debtor.

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Case No.: 16-31715 DHW-13

OBJECTION OF REPUBLIC FINANCE, LLC

Comes now Acceptance Loan Company, Inc. (hereinafter "Acceptance") and respectfully objects to the confirmation of the Debtor's Chapter 13 Plan, and as grounds therefore states the following:

1. Debtor, Kendrick Finklea (hereinafter "Debtor") executed a Promissory Note / Security Agreement for sum of \$4,170.39 on May 20, 2016, and received \$1,007.76 in cash.
2. Debtor filed this Bankruptcy Petition on June 29, 2016, less than 40 days from receiving the sum of \$1,007.76 from Acceptance.
3. The plan does not provide an adequate protection payment to Acceptance.
4. Acceptance is adversely affected by the filed plan.
5. The filed plan is discriminatory as regards Acceptance.
6. The filed plan is not filed in good faith as regards Acceptance.

**WILLIAM C. POOLE, LLC
Attorney For
Acceptance Loan Co., Inc.**

/s/ William C. Poole
**William C. Poole POOLW4929
917 Western America Circle
Suite 200
Mobile, Alabama 36609
(251) 344-5015 (251) 344-5125 fax**

CERTIFICATE OF SERVICE

I do hereby certify that on this the 22nd day of November, 2016, a copy of the foregoing document was served on the following:

Sabrina McKinney
Ch. 13 Acting Trustee
Post Office Box 173
Montgomery, AL 36101

Joshua C. Milam
Shinbaum & Campbell
566 S. Perry Street
Montgomery, AL 36104

by Electronic Case Filing a copy of the same.